

DOLLY M. TROMPETER, ESQ.
CA Bar ID No. 235784
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 415-271-8604
Fax: 866-282-6709
dolly@dollydisabilitylaw.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Maria Lourdes Dela Torre, }
Plaintiff, }
vs. }
Kilolo Kijakazi, Acting }
Commissioner of Social Security, }
Defendant. }
} Case No. 1:23-cv-01160-BAM
} STIPULATION AND PROPOSED
} ORDER FOR EXTENSION OF
} TIME

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from December 11, 2023 to February 9, 2024, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due

1 on the same week. For the weeks of December 11, 2023 and December 18, 2023,
2 Counsel has eighteen merit briefs due. Counsel requires additional time to brief
3 the issues thoroughly for the Court's consideration. Defendant does not oppose the
4 requested extension. Counsel apologizes to the Defendant and Court for any
5 inconvenience this may cause.

Respectfully submitted,

Dated: November 29, 2023 PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Dolly M. Trompeter
DOLLY M. TROMPETER
Attorneys for Plaintiff

Dated: November 29, 2023 PHILLIP A. TALBERT
United States Attorney
MATTHEW W. PILE
Associate General Counsel
Office of Program Litigation, Office 7

By: *s/ Franco L. Becia
Franco L. Becia
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on November 29, 2023)

ORDER

Pursuant to stipulation and good cause appearing, IT IS SO ORDERED that Plaintiff shall file and serve Defendant with Plaintiff's Motion for Summary Judgment on or before February 9, 2024.

IT IS SO ORDERED.

Dated: November 30, 2023

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE